

RIEMER & ASSOCIATES LLC
Attorneys for Plaintiff
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
EUGENE RUOFF

08 CV 4324 (SHS)

Plaintiff,

PLAINTIFF'S DISCOVERY
RESPONSE
PURSUANT TO
RULE 26(a)

-against-

CIGNA LIFE INSURANCE COMPANY
OF NORTH AMERICA,

Defendant.
-----X

Plaintiff, by Riemer & Associates LLC, responding to the discovery mandated by Rule 26(a) of the Federal Rules of Civil Procedure provides as follows:

The following initial disclosure is made based on the information reasonably available to plaintiff as of the date of this statement. By making this disclosure, plaintiff does not represent that he is identifying every document, tangible thing, or witness possibly relevant to this lawsuit, nor does plaintiff waive his right to object to the production of any documents or tangible thing on the basis of privilege, the work product doctrine, relevancy, undue burden or any other valid objection. Rather, plaintiff's disclosure represents his good faith effort to identify information subject to the disclosure requirements of Rule 26(a)(1).

A. The following individuals are likely to have discoverable information relevant to the complaint:

Plaintiff

Plaintiff's Treating Providers

Richard Horowitz, M.D.
Hudson Valley Healing Arts Center, Inc.
4232 Albany Post Road
Hyde Park, NY 12538

John Fallon, F.N.P.
Hudson Valley Healing Arts Center, Inc.
4232 Albany Post Road
Hyde Park, New York 12538

John Keilp, Ph.D.
Columbia University Medical Center
Lyme and Tick-Borne Diseases Research Center
1051 Riverside Drive
New York, NY 10032

Others

John and Margarete Ruoff
7 Emil's Drive
Gardiner, NY 12525

Karin Ruoff
225 Guilford Rd.
New Paltz, NY 12561

B. The following categories of relevant documents are in the possession of plaintiff: Medical records and reports; Correspondence with CIGNA; CIGNA Forms; Plan documents; Social Security Disability records.

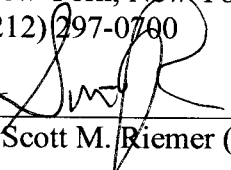
C. The following are categories of damages requested by plaintiff:

Monthly disability benefits equal to 60% of Indexed Covered Earnings commencing April 13, 2007, plus interest thereon and attorneys fees and costs.

D. Upon information and belief, there are no relevant insurance agreements.

DATED: New York, New York
August 12, 2008

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By: 
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